

FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA

2016 APR 27 A 11:00

U.S. DISTRICT COURT  
N.D. OF ALABAMAJimmy Lee WatkinsInmate Identification Number: ALS #276564(Enter above the full name of the plaintiff  
in this action)

## NOTICE TO FILING PARTY

*It is your responsibility to  
notify the clerk in writing of any  
address change.**Failure to notify the clerk may  
result in dismissal of your case  
without further notice.*MORGAN COUNTY vs.  
COMMISSIONER - DOE  
SHERIFF - JEFFERSON DUNN  
SGT - CORRIKO  
CO-11 - OZBOLT  
CO-11 - ALLEN  
CO-6 - MCVAH  
CO-11 - DRIGGERS  
FEDERAL INMATE - DOE  
MCJF - INFIRMERY - STAFFS(Enter above full name(s) of the defendant(s)  
in this action)NO MAGISTRATE RECOMMENDATIONSJURY TRIAL REQUESTED

CV-16-K-0681-ME

## I. Previous lawsuits

- A. Have you begun other lawsuits in state or federal court(s) dealing with the
- 
- same facts involved in this action or otherwise relating to your imprisonment?

Yes ( ) No ( ☒ )

- B. If the answer to (A) is "yes," describe each lawsuit in the space below. (If there is more
- 
- than one lawsuit, describe the additional lawsuit(s) on another piece of paper, using the
- 
- same outline.)

## 1. Parties to this previous lawsuit:

Plaintiff: \_\_\_\_\_

Defendant(s): \_\_\_\_\_

2. Court (if Federal Court, name the district; if State Court, name the county)

NONE

3. Docket number NONE

4. Name of judge to whom case was assigned NONE

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) NONE

6. Approximate date of filing lawsuit NONE

7. Approximate date of disposition NONE

II. Place of present confinement LIME STONE CORR. FACILITY

A. Is there a prisoner grievance procedure in this institution?

Yes ( ☒ )

No ( )

I DONT HAVE COPIES AND NEVER GOT,  
NOR RECEIVED ANY ANSWERS FROM  
MORGAN COUNTY CORR. FACILITY

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure? Yes ( ) No ( ☒ )

C. If your answer is YES:

1. What steps did you take? NONE

2. What was the result? NONE

D. If your answer is NO, explain why not: THE GRIEVANCE SYSTEM IN D.C.C.  
DOES NOT APPLY TO PRETRIAL DETAINEE.

## III. Parties.

In item (A) below, place your name in the first blank and place your present address in the second blank.

A. Name of Plaintiff(s) JIMMY LEE WATKINS

Address LIMESTONE CORR. FACILITY 28779 NICK DAVIS RD.  
HARVEST AL. 35749-7009

In item (B) below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use Item (C) for the names, positions, and places of employment of any additional defendants.

B. Defendant COMMISSIONER - DOE

Is employed as MORGAN COUNTY COMMISSIONER

at MORGAN COUNTY

C. Additional Defendants <sup>ANNA FRANKLIN</sup> SHERIFF - DOE, SGT - CORRICO, CO - OZBOLT, CO - ALLEN  
CO - MCVAY, CO - DRIGGERS, FEDERAL WHATE - DOE?, MCG - INFIRMERY ON THE  
SHIFT OF OCT. 31, 2015 FROM 6:30 PM, ALSO ALL OFFICERS FROM  
OCT. 31, 2015 IN A-POD FROM 6 AM TO 6 PM, AND SEPT 9, 2015 FROM  
6 AM TO 6 PM, MED STAFF: DR. DOE AND NURSE DOE (WARDEN BRADY)

## IV. Statement of Claim

State here, as briefly as possible, the FACTS of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets, if necessary. I WOULD LIKE TO HAVE NOTIFICATION OF THE DISTRICT COURT'S ATTENTION, I COME IN A PEACEFUL MATTER, I'M NOT LOOKING FOR A MATTER OF REVENGE BUT A CHANGE. . . MAY GOD BLESS YOU. . .

\* I'VE BEEN VIOLATED, MY SPIRIT IS IN JEOPARDY, I FEEL AS I WAS IN A STATE OF A DEVASTATED HELPLESS MATTER. OFFICER OZBOLT, HE DID NOT TREAT ME AS A HUMAN BEING AND TOOK MY LIFE AS A JOKE. WHEN I NEEDED HIM I DID NOT SEE NOR HEAR FROM HIM IN THE TIME OF MY CRISIS. ON THAT SAME SHIFT THE FOLLOWING OFFICERS

WAS INVOLVED AS THEY DID NOT CARE WHEN I TOLD THEM. I TOLD THE FOLLOWING OFFICERS WHAT HAD HAPPENED WHICH IS LOCATED IN THE PLAINTIFF SIDE, I NEVER HEARD ANYTHING FROM THE WARDEN WHEN I TEXT IN THE KIOSK MACHINE. MY BEHAVIOR IS A REFLECTION OF HOW THEY TREATED ME, BUT I STILL HAVE A POSITIVE CHARACTER. IT THROUGHT OUT THE MONTHS I'VE BEEN AT MORGAN COUNTY JAIL FACILITY, IT'S NOT ABOUT THE LAWSUIT NOR THE AMOUNTS BUT ITS FOR OTHERS THAT ARE LOSING HOPE AND SEE WHAT I'VE SEEN, AND ALSO GOING THROUGH THE SUFFERENCE IN MORGAN COUNTY JAIL FACILITY. PLEASE UNDERSTAND THAT I WAS DENIED OF A VERY SERIOUS MEDICAL TREATMENT AND STILL GET THE DEFECTS FROM THE OCCURENCE FROM WHEN THE SITUATION HAPPENED. I REQUESTED IT FROM (2) DIFFERENT SHIFTS AND FIVE DIFFERENT OFFICERS. I WOULD LIKE TO HAVE AS INDIVIDUAL CLAIMS FROM EACH OFFICER, THE WARDEN THE MEDICAL STAFF MEMBERS IN ~~THE~~ SHIFTS ALSO THE SHERIFF AND COMMISSIONER TO GO.  
(BOTH)

ALSO MY CIVIL RIGHTS... EIGHTH AND FOURTEENTH AMENDMENTS. I WOULD LIKE TO BE PROVIDED WITH ALL EVIDENCE HELD FROM PROFESSIONAL LAWYER ALSO AND PEOPLE THAT CAN REPRESENT AND STAND BEHIND US TOGETHER AS PEOPLE NATION

THEY ALL ACTED UNDER COLOR OF STATE, I WAS VIOLATED IN THE MATTER OF MY US. CONST. AND

# V. RELIEF

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

\* PAY: \$350.00 FOR A FILING FEE FOR MY IN FORMA PAUPERIS TO THE CLERK  
 \* I WOULD LIKE TO SUE EACH INDIVIDUAL FOR NO MORE THAN \$80,000 & NO LESS THAN \$50,000 FOR VIOLATIONS OF MY CONSTITUTIONAL RIGHTS, ALSO DAMAGES IN MY CRIMINAL AND THE DUE PROCESS OF MY MEDICAL FORMS & GRIEVANCE THAT I NEVER GOT A REPLY FROM \* THE COMMISSIONER, SHERIFF, AND THE WARDEN I WOULD LIKE FOR YOU ALL TO MAKE ESTABLISHMENTS ON THE FOOD CHANGE BETTER CLOTHING AND TO PROVIDE MORE POSITIVE ACTIVITIES THROUGHOUT MORRIS COUNTY JAIL FACILITY. AND WOULD LIKE TO SET MY ~~WARRANT~~ LAWSUIT AT NO MORE THAN \$80,000 AND NO LESS THAN \$50,000 FOR THE LACK OF RESPONSIBILITY ON OFFICERS AND DAILY TO WEEKLY INSPECTIONS AND I WOULD LIKE TO HAVE MY NAME ACROSS FOR BETTER CHANCE, IF WE BELIEVE WE CAN \* THEN THINKING AHEAD IS OUR RESOLUTION FOR CHANGE; PLAN AHEAD, STAY AHEAD, KEEP A LEVELATED MIND. LETS ELEVATE OUR THOUGHTS TOGETHER BECAUSE THE CHILDREN ARE OUR FUTURE... PEOPLE NATION - BLACK PEACESTONE ORG. MAY GOD BLESS YOU AND THANK YOU VERY MUCH!!! ROMANS 8:10"

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 19, 2016  
11:03 AM

\* SEE SEPERT PAPER ATTACHED FOR BETTER DETAILS.

Jimmy J. Watkins  
 SIGNATURE

ADDRESS 21 ME STONE COR2. FACILITY 28779 NICK

DAVIS ROAD, HARVEST AL. 35749

AIS # 276564

Daryl R. Ragsdale  
 NOTARY PUBLIC

10/30/17  
 Comm expires



GREETINGS, I WOULD LIKE TO HAVE NOTIFICATION OF THE DISTRICT COURTS ATTENTION. I COME IN A VERY PEACEFUL MATTER, I'M NOT HERE LOOKING FOR A MATTER OF REVENGE; BUT LOOKING FOR HELP AND SUPPORT TO CHANGE...

\* MAY GOD BLESS YOU ALL!

• I'VE BEEN VIOLATED, MY SPIRIT IS IN GREAT JEOPARDY. I FEEL AS I HAVE BEEN IN A STATE WHICH WAS DEVASTATED AND ALSO "HELPLESS SITUATION". OFFICER OZBOLT, SGT CORRIKO, CO. DRIGGERS, CO. ALLEN, CO. MC VAY, FEDERAL INMATE, MCJF - INFIRMEY STAFFS, SHERIFF ANNA FRANKLIN, COMMISSIONER OF MORGAN COUNTY, AND COMMISSIONER JEFFERSON DONN HAVE VIOLATED MY RIGHTS, WARDEN BRADLEY ALSO...

• OFFICER OZBOLT, AND THE OTHER STAFFS ON HIS SHIFT OCTOBER 31, 2015 BETWEEN THE TIME RANGE OF: 10:30 AM - 1:45 AM ACTED IN A VIOLATION OF MY CONSTITUTIONAL RIGHTS, THEY ACTED AS IF I WAS NOT HUMAN. ALSO THEY TOOK MY LIFE AS A JOKE... WHEN I NEEDED PROTECTION IT WAS NOT PROVIDED, NEITHER WAS I PROVIDED WITH MEDICAL ASSISTANCE. THEY ALL ACTED AS THEY DID NOT CARE. SO FORTH WITH THE NEXT SHIFT OF: SEPT. 1, 2015. AS SEEN ON CAMERA ON SEPT 1, 2015 BETWEEN 5:30 AM AND 7:35 AM I'M WALKING INJURED DOWN THE HALL BEING ESCORTED TO A DISCIPLINARY DORM. OFFICER DRIGGERS ASKED ME WHAT HAD HAPPEN ON THE LAST SHIFT, I TOLD HIM IN A CALM AND VERY HUMBLE TONE THAT I WAS ATTACKED BY A FEDERAL INMATE AND I ASKED FOR MEDICAL ATTENTION AND DID NOT RECEIVE ANY TYPE OF STAFF ASSISTANCE OR MEDICAL TREATMENT AND I ALSO ASKED FOR GRIEVANCES AND NEVER RECEIVED ANY. I ASKED OFFICERS ON BOTH SHIFTS ABOUT MEDICAL TREATMENTS AND GRIEVANCES BUT I ALWAYS GOT PUT ON HOLD. I NEVER GOT A REPLY FROM THE WARDEN OR FROM ANY HIGHER AUTHORITY, EVEN AFTER THE FACILITY GOT THEIR XRAY MACHINES.

• THIS BRIEF COMPLAINT IS NOT ABOUT THE ESSENCE OF REVENGE; NEITHER IS IT ABOUT THE LAWSUIT OF THE MONEY. EVEN THOUGH I HELD STRONG AND KEPT A POSITIVE CHARACTER, SOME OF MY BEHAVIOR REFLECTS FROM HOW I WAS TREATED AS A PRETRIAL DETAINEE TAILED IN MORGAN COUNTY JAIL FACILITY. THROUGHOUT THE MONTHS OF BEING TAILED, I'VE LEARNED THAT WE AS PEOPLE DESERVE TO BE TREATED AS HUMANS, AND ANY INMATE OR HUMAN TAILED SHOULD NOT GO THROUGH A TRIAL OF SUFFERENCE FROM C.O./STAFF OFFICERS BUT TO KEEP EACH OTHER ENCOURAGED AND TO STAND UP FOR WHAT IS RIGHT.

• "PLEASE UNDERSTAND"; THAT I JIMMY LEE WATKINS (424-310854) WAS DENIED OF MY U.S. CONST. RIGHTS, ALSO MY CIVIL RIGHTS. EIGHTH AND FOURTEENTH AMENDMENTS

• I WOULD LIKE TO BE PROVIDED WITH YOUR ASSISTANCE WITH PROOF OF EVIDENCE, LAWYER S, AND PEOPLE IN THIS NATION THAT CAN STAND UP FOR WHAT'S RIGHT TO STAND BESIDE AND BEHIND US. (\* I TRY TO WORK OUT LIKE I USED TO; BUT MY CONDITION SIGNIFICANTLY AFFECT MY DAILY ACTIVITIES.)

• I WOULD LIKE THE FOLLOWING IN THIS RELIEF: TRIAL BY JURY DEMANDS, NO MAGISTRATE RECOMMENDATIONS.

\* INJUNCTIVE RELIEF AND DECLARATORY JUDGMENT: "THEY ARE LIABLE FOR UNDER DELIBERATE INDIFFERENCE"

ROMANS 1:8-10 \* I EVEN TOLD THE NURSES WHEN I GOT TO KILBY AND HERE AT LIMESTONE THAT MY HEAD WAS SMASHED INTO THE WALL AND STILL NOTHING... \* \* \* PERMANENT SCAR IN THE TOP RIGHT SIDE OF MY CRANIUM. I SUFFER FROM HEADACHES ON RANDOM DAYS I TRY TO WORK OUT.

\*RELIEF\* (V.)

- PAY FOR FILING FEE'S FOR: IM PAUPERIS TO THE CLERK . . . \$350.00\*\*
- I WOULD LIKE TO FILE A LAWSUIT FOR NO MORE THAN \$85,000.00 AND NO LESS THAN \$35,000.00, FROM EACH INDIVIDUAL WHO DENIED MY MEDICAL ASSISTANCE AND NO PROTECTION FROM THE ATTACK OF THE FEDERAL INMATE.
- FOR THE WARDEN, SHERIFF, AND THE COMMISSIONER, I WOULD LIKE TO FILE A LAWSUIT FOR NO MORE THAN \$85,000.00 AND NO LESS THAN \$55,000.00 FOR THE LACK OF RESPONSIBILITY ON THE STAFF OFFICERS, AND WEEKLY TO MONTHLY INSPECTIONS INSIDE MORGAN COUNTY JAIL FACILITY. ALSO MORE POSITIVE PROGRAMS TO HELP THE PEOPLE THAT ARE SEEKING FOR CHANGE IN THEIR LIVES.
- WITH YOU ALL AND YOUR SUPPORT I WOULD LIKE TO HAVE HELP MAKING A DRAMATIC CHANGE WITH A PICTURE WITH YOU ALL WHO CAN HAVE OR "IF YOU HAVE SPARE TIME" TO PLACE ON DIFFERENT BILLBOARDS QUOTING: "IF WE BELIEVE THAT WE CAN CHANGE THEN SO ITS POSSIBLE" THINGS THAT ARE POSITIVE ELEVATE OUR THOUGHTS. TOGETHER WE CAN PLAN AHEAD TO STAY AHEAD, AND KEEP A LEVITATED MIND. THE CHILDREN ARE OUR FUTURE. LETS KEEP OUR THOUGHTS ELEVATED TOGETHER WITH ORGANIZATION. ~~PEOPLE NATION~~ (PEOPLE NATION) "\*\*\*\*\*" ITS TIME FOR A CHANGE, ITS TIME THAT WE MAKE A DIFFERENCE.

MESSSENGER'S

QUOTE...

\* THEY CANT OUT THINK THE THINKER, BECAUSE THE TAE THOUGHTS THEY ARE THINKING WE, "US" AS PEOPLE NATION ALREADY THOUGHT ABOUT. . .

-By-  
J. Jimmy Lee Whitens  
PROVERBS 16: 21-22 (20)

4-20-16

DATE

Jimmy Lee Whitens  
PLAINTIFF  
Dayl Raggett  
NOTARY PUBLIC

Comm expires  
10/30/17

State of Alabama Unified Judicial System  Form C-10 Page 1 of 2	<b>AFFIDAVIT OF SUBSTANTIAL HARDSHIP AND ORDER</b>	Case Number
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IN THE DISTRICT COURT OF NORTHERN DISTRICT OF, ALABAMA  
 (Circuit, District, Municipal) (Name of County or Municipality)

STYLE OF CASE: JIMMY LEE WATKINS v. LISTED ON COMPLAINT  
 Plaintiff(s) Defendant(s)

TYPE OF PROCEEDING: \_\_\_\_\_ CHARGE(s) (if applicable): \_\_\_\_\_

☐ CIVIL CASE -- I, because of substantial hardship, am unable to pay the docket fee and service fees in this case. I request that these fees be waived initially and taxed as costs at the conclusion of the case.

☒ CIVIL CASE -- (such as paternity, support, termination of parental rights, dependency) - I am financially unable to hire an attorney and I request the court to appoint one for me.

☐ CRIMINAL CASE -- I am financially unable to hire an attorney and request that the court appoint one for me.

☐ DELINQUENCY/NEED OF SUPERVISION -- I am financially unable to hire an attorney and request that the court appoint one for my child/me.

  

**AFFIDAVIT**

**SECTION I.**

**1 IDENTIFICATION**

Full name JIMMY LEE WATKINS Date of birth 5-5-89

Spouse's full name (if married) NONE

Complete home address LIMESTONE CARE FACILITY 28779 NICK DAVIS RD. HARVEST ALA. 35749

Number of people living in household NONE

Home telephone number NONE

Occupation/Job NONE Length of employment N/A

Driver's license number NONE \*Social Security Number 424-34654

Employer NO Employer's telephone number NONE

Employer's address NONE

  

**2 ASSISTANCE BENEFITS**

Do you or anyone in your household receive benefits from any of the following sources? (if so, please check those which apply.)

☐ AFDC ☐ Food stamps ☐ SSI ☐ Medicaid ☐ Other NONE

  

**3 INCOME/EXPENSE STATEMENT**

Monthly Gross Income:

Monthly Gross Income \$ 0

Spouse's Monthly Gross Income (unless a marital offense) \$ 0

Other Earnings: Commissions, Bonuses, Interest Income, etc. \$ 0

Contributions from Other People Living in Household \$ 0

Unemployment/Workmens's Compensation, Social Security, Retirements, etc. \$ 0

Other Income (be specific) 0 \$ 0

**TOTAL MONTHLY GROSS INCOME** \$ 0

  

Monthly Expenses:

A. Living Expenses

Rent/Mortgage \$ 0

Total Utilities: Gas, Electricity, Water, etc. \$ 0

Food \$ 0

Clothing \$ 0

Health Care Insurance \$ 0

Car Payment(s)/Transportation Expenses \$ 0

Loan Payment(s) \$ 0

Form C-10 Page 2 of 2 Rev. 2/95		<b>AFFIDAVIT OF SUBSTANTIAL HARDSHIP AND ORDER</b>	
<p>Monthly Expenses: (con'd page 1)</p> <p>Credit Card Payment(s) <u>                    </u></p> <p>Educational/Employment Expenses <u>                    </u></p> <p>Other Expenses (<i>be specific</i>) <u>                    </u></p> <p style="text-align: right;"><b>Sub-Total</b> <u>                    </u> <b>A \$</b> <u>                    </u></p>			
<p>B. Child Support Payment(s) Alimony <u>                    </u> <b>\$</b> <u>                    </u></p> <p style="text-align: right;"><b>Sub-Total</b> <u>                    </u> <b>B \$</b> <u>                    </u></p>			
<p>C. Exceptional Expenses <u>                    </u> <b>\$</b> <u>                    </u></p> <p style="text-align: right;"><b>TOTAL MONTHLY EXPENSES (add subtotals from A &amp; B monthly only)</b> <b>\$</b> <u>                    </u></p>			
<p>Total Gross Monthly Income Less total monthly expenses:</p> <p style="text-align: right;"><b>DISPOSABLE MONTHLY INCOME</b> <b>\$</b> <u>                    </u></p>			
<p><b>4 LIQUID ASSETS:</b></p> <p>Cash on Hand/Bank (<i>or otherwise available as stocks, bonds, certificates of deposit</i>) <u>                    </u> <b>\$</b> <u>                    </u></p> <p>Equity in Real Estate (value of property less what you owe) <u>                    </u></p> <p>Equity in Personal Property, etc (such as the value of motor vehicles, stereo, VCR, furnishing, jewelry, tools, guns, less what you owe) <u>                    </u></p> <p>Other (<i>be specific</i>) <u>                    </u></p> <p>Do you own anything else of value? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <u>                    </u></p> <p>(land, house, boat, TV, stereo, jewelry) <u>                    </u></p> <p>If so, describe <u>                    </u></p> <p style="text-align: right;"><b>TOTAL LIQUID ASSETS</b> <b>\$</b> <u>                    </u></p>			
<p><b>5 Affidavit/Request</b></p> <p>I swear or affirm that the answers are true and reflect my current financial status. I understand that a false statement or answer to any question in the affidavit may subject me to the penalties of perjury. I authorize the court or its authorized representative to obtain records of information pertaining to my financial status from any source in order to verify information provided by me. I further understand and acknowledge that, if the court appoints an attorney to represent me, the court may require me to pay all or part of the fees and expenses of my court-appointed counsel.</p> <p>Sworn to and subscribed before me this <u>20</u> day of <u>April</u>, <u>2016</u></p> <p><u>Darryl K. Gagne/Notary</u> <u>10/30/19</u> <u>                    </u></p> <p style="text-align: right;"><u>                    </u> <u>                    </u></p> <p style="text-align: right;">Affiant's Signature <u>                    </u></p> <p style="text-align: right;">Print or Type Name <u>                    </u></p>			
<b>ORDER OF COURT</b>			
<p><b>SECTION II.</b></p> <p><b>IT IS THEREFORE, ORDERED, AND ADJUDGED BY THE COURT AS FOLLOWS:</b></p> <p><input type="checkbox"/> Affiant is not indigent and request is DENIED.</p> <p><input type="checkbox"/> Affiant is partially indigent and able to contribute monetarily toward his/her defense; therefore defendant is ordered to pay \$ <u>                    </u> toward the anticipated cost of appointed counsel. Said amount is to be paid to the clerk of court as otherwise ordered and disbursed as follows: <u>                    </u></p> <p><input type="checkbox"/> Affiant is indigent and request is GRANTED.</p> <p><input type="checkbox"/> The prepayment of docket fees is waived.</p> <p>IT IS FURTHER ORDERED AND ADJUDGED THAT <u>                    </u> is hereby appointed as counsel to represent affiant.</p> <p>IT IS FURTHER ORDERED AND ADJUDGED that the court reserves the right and may order reimbursement of attorney fees and expenses, approved by the court and paid to the appointed counsel, and costs of court.</p> <p>Done this <u>                    </u> day of <u>                    </u>, <u>                    </u></p> <p style="text-align: right;"><u>                    </u> Judge</p>			